

EXHIBIT 7

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
TODD DANNHAUSER, and
TD CO., L.P.,

Plaintiffs,

-against-

TSG REPORTING, INC.,

Defendant.
----- X

Case No. 16-CV-747(CM)

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO
DEFENDANT'S
FIRST SET OF INTERROGATORIES**

I.

RESERVATION OF RIGHTS

These responses and objections are made without any waiver of:

1. The right to object to the competency, relevancy, or materiality of any Response or the subject matter of any Response;

2. All objections that may be available at any hearing or trial or on any motion to the use or admissibility of any material produced. The production of any document does not constitute an admission by Plaintiffs that such document or the information contained therein is relevant to this action or admissible in evidence. Plaintiffs do not waive or intend to waive but, rather, intend to preserve and hereby do preserve all rights to object on any ground to the use of any of these Responses and/or documents produced in this or any other case, action, matter or proceeding; and

3. The right to supplement, revise, correct, or clarify any of the Responses herein and to produce and utilize additional documents that may become available or come to Plaintiffs'

INTERROGATORY NO. 1:

Please identify each of the commissions that Plaintiffs claim were erroneously calculated or unpaid by TSG to TD Co. by listing the case, Engaging Person, firm, RARE, commission percentage, and amounts that TSG already provided to TD Co. with respect to such commissions, if any. If Plaintiffs are claiming damages for any commission prior to January 1, 2014, then the time period for this interrogatory begins with the date of the first commission that Plaintiffs contend was not paid or was erroneously calculated.

RESPONSE:

Plaintiffs incorporate the General Objections as if fully set forth herein. Plaintiffs object to this Interrogatory because it purports to require Plaintiffs to disclose information outside of Plaintiffs' possession, custody or control and/or seeks information that is currently in Defendant's possession, custody, or control. Plaintiffs will provide a Response once Defendant produces the documents necessary to respond to this Interrogatory.

Supplemental Response: Plaintiffs respond that TSG has represented that the 2015 Q2 incentive bonus was erroneously under-calculated by \$2,394.95 and otherwise refers to Exhibit A for all information related to the erroneously calculated commission as provided by TSG. In addition, Exhibit A evidences TSG's intent to "sit back and wait for [Plaintiff] to point out" unpaid commissions.

INTERROGATORY NO. 2:

For each commission as identified in Interrogatory No. 1 above, please list the case, Engaging Person, firm, RARE, commission percentage, and amounts of the commission that Plaintiffs contend should have been paid by TSG.

RESPONSE:

Plaintiffs incorporate the General Objections as if fully set forth herein. Plaintiffs object to this Interrogatory because it purports to require Plaintiffs to disclose information outside of Plaintiffs' possession, custody or control and/or seeks information that is currently in

Defendant's possession, custody, or control. Plaintiffs will provide a Response once Defendant produces the documents necessary to respond to this Interrogatory.

Supplemental Response: Plaintiffs respond that TSG has represented that the 2015 Q2 incentive bonus was erroneously under-calculated by \$2,394.95 and otherwise refers to Exhibit A for all information related to the erroneously calculated commission as provided by TSG. In addition, Exhibit A evidences TSG's intent to "sit back and wait for [Plaintiff] to point out" unpaid commissions.

INTERROGATORY NO. 3:

Please identify all persons with knowledge concerning the allegations in the Amended Complaint or the counterclaims asserted by TSG.

RESPONSE:

Plaintiffs incorporate the General Objections as if fully set forth herein. Plaintiffs reserve the right to supplement, revise, correct, or clarify this Response. Subject to and without waving any of the foregoing General Objections, Plaintiffs state that the following persons have knowledge concerning the allegations in the Amended Complaint: (1) Todd Dannhauser; (2) Michael Rixon; (3) counsel to Todd Dannhauser, including William A. Brewer, Austin C. Smith, and Michael L. Smith, whose contact information is 750 Lexington Ave, New York, NY, 10022, (212) 489-1400.

Supplemental Response: Plaintiffs respond that the above list consists all persons who have knowledge of the allegations in the Amended Complaint or counterclaims asserted by TSG.

INTERROGATORY NO. 4:

Please identify all persons with knowledge concerning the employment opportunities, partnerships, or ventures that Dannhauser explored and/or any interviews, meetings or communications regarding Dannhauser's potential employment subsequent to October 1, 2015, including but not limited to the identity of such potential employers, partnerships, or ventures.

Dated: New York, New York
July 1, 2016

Respectfully submitted,

By: /s/ Austin Smith
William A. Brewer III
Austin C. Smith
BREWER, ATTORNEYS & COUNSELORS
750 Lexington Ave., 14th Floor
New York, New York 10022
Telephone: (212) 489-1400

ATTORNEYS FOR PLAINTIFF

**VERIFICATION OF RESPONSES TO TSG REPORTING, INC.'S FIRST SET OF
INTERROGATORIES**

I, Todd Dannhauser, believe, based on reasonable inquiry, that the foregoing responses to the first set of interrogatories are true and correct to the best of my knowledge, information, and belief.

I hereby verify under penalty of perjury that the foregoing is true and correct.

Executed on 08/12/16, 2016

By: 

Todd Dannhauser

REDACTED FILED UNDER SEAL